

Mr. Keith Beatty
Kimball Office Casegoods Manufacturing - Salem
200 Kimball Blvd.
Salem, Indiana 47167

Re: 175-12017
Modification to Modification No:
175-11617-00007

Dear Mr. Beatty:

Kimball Office Casegoods Manufacturing - Salem applied for a Part 70 operating permit on June 4, 1996 for a wood furniture manufacturing facility. An application to modify the source by installing a spray booth (SB21) was received on September 29, 1999. Pursuant to 326 IAC 2-7-10.5 the following emission units were approved for construction and operation at the source on November 1, 1999:

One (1) touch up/repair/special project spray booth, identified as SB21, equipped with dry filters and exhausting to two stacks, SB21A and SB21B.

On February 14, 2000, Kimball Office Casegoods Manufacturing - Salem was issued a modification (175-11617) to the Minor Source Modification (175-11390) issued for the above emission unit to include SB21 under the source-wide emission limitation and to add applicable language from 40 CFR 63, Subpart JJ.

On March 13, 2000, the source requested that the last sentence of Condition D.1.13(c)(1) from Modification No. 175-11617, which references differentiation of solvents added to coatings and those used as cleanup solvents be removed. Since all cleanup solvent usage must be recorded under Condition D.1.13(c)(4), the sentence to differentiate solvents from Condition D.1.13(c)(1) can be removed. Also, documentation to show compliance for Condition D.1.2 is not necessary. Therefore, the following changes have been made to the permit.

D.1.13 Record Keeping Requirements

- (c) To document compliance with Conditions ~~D.1.2 and~~ D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions ~~D.1.2 and~~ D.1.5.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for extension (3-8396), or dial (317) 233-8396.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments

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cc: File - Washington County
Washington County Health Department
Air Compliance Section Inspector - Ray Schick
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner
Kimball International, Inc. – Gayle Pahmeier

PART 70 MINOR SOURCE MODIFICATION OFFICE OF AIR MANAGEMENT

**Kimball Office Casegoods Manufacturing - Salem
200 Kimball Boulevard
Salem, Indiana 47167**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this approval.

This approval is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Source Modification No.: 175-11390-00007	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date: November 1, 1999

First Modification to Minor Source Modification No.: 175-11617, issued February 14, 2000

Modification to First Modification No.: 175-12017 revised pages: 13b, 13c	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

SECTION D.1**FACILITY OPERATION CONDITIONS****Facility Description [326 IAC 2-7-5(15)]**

One (1) touch up/repair/special project spray booth, identified as SB21, equipped with dry filters and exhausting to two stacks, SB21A and SB21B.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]**D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]**

Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:

- Airless Spray Application
- Air Assisted Airless Spray Application
- Electrostatic Spray Application
- Electrostatic Bell or Disc Application
- Heated Airless Spray Application
- Roller Coating
- Brush or Wipe Application
- Dip-and-Drain Application

High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

D.1.2 Emission Limitations

Any change or modification to spray booth SB21, that will cause potential emissions of 25.0 tons per year or more of any criteria pollutant must have prior approval from the Office of Air Management, pursuant to 326 IAC 2-7-10.5(g).

- (1) 25.0 tons per year or more of particulate matter (PM), or
- (2) 15.0 tons per year or more of particulate matter less than ten (10) microns (PM10), or
- (3) 40.0 tons per year or more of volatile organic compounds (VOCs),

The total source VOC emissions shall be less than 250 tons per year.

D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The particulate matter (PM) from the spray booth (SB21) shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and

P = process weight rate in tons per hour

D.1.4 General Provisions Relating to HAPs [326 IAC 20-14][40 CFR 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-14, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart JJ.

D.1.5 Wood Furniture NESHAP [40 CFR 63, Subpart JJ]

- (a) The wood furniture coating operation is subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20-14, (40 CFR 63, Subpart JJ), with a compliance date of December 7, 1998.
- (b) Pursuant to 40 CFR 63, Subpart JJ, the wood furniture coating operations shall comply with the following conditions:
 - (1) Limit the Volatile Hazardous Air Pollutants (VHAP) emissions from finishing operations as follows:
 - (A) Achieve a weighted average volatile hazardous air pollutant (VHAP) content across all coatings of one (1.0) pound VHAP per pound solids; or
 - (B) Use compliant finishing materials in which all stains, washcoats, sealers, topcoats, basecoats and enamels have a maximum VHAP content of one (1.0) pound VHAP per pound solid, as applied. Thinners used for on-site formulation of washcoats, basecoats, and enamels have a three percent (3.0%) maximum VHAP content by weight. All other thinners have a ten percent (10.0%) maximum VHAP content by weight; or
 - (C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids; or
 - (D) Use a combination of (A), (B), and (C).
 - (2) Limit VHAP emissions contact adhesives as follows:
 - (A) For foam adhesives used in products that meet the upholstered seating flammability requirements, the VHAP content shall not exceed 1.8 pound VHAP per pound solids.
 - (B) For all other contact adhesives (except aerosols and contact adhesives applied to nonporous substrates) the VHAP content shall not exceed one (1.0) pound VHAP per pound solids.

(C) Use a control device to limit emissions to one (1.0) pound VHAP per pound solids.

(3) The strippable spray booth material shall have a maximum VOC content of eight-tenths (0.8) pounds VOC per pound solids.

D.1.6 Work Practice Standards [40 CFR 63.803]

The owner or operator of an affected source subject to this subpart shall prepare and maintain a written work practice implementation plan within sixty (60) calendar days after the compliance date. The work practice implementation plan must define environmentally desirable work practices for each wood furniture manufacturing operation and at a minimum address each of the following work practice standards as defined under 40 CFR 63.803:

- (a) Operator training course.
- (b) Leak inspection and maintenance plan.
- (c) Cleaning and washoff solvent accounting system.
- (d) Chemical composition of cleaning and washoff solvents.
- (e) Spray booth cleaning.
- (f) Storage requirements.
- (g) Conventional air spray guns shall only be used under the circumstances defined under 40 CFR 63.803(h).
- (h) Line cleaning.
- (i) Gun cleaning.
- (j) Washoff operations.
- (k) Formulation assessment plan for finishing operations.

D.1.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.1.8 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

Pursuant to 40 CFR 63, Subpart JJ, if the Permittee elects to demonstrate compliance using 63.804(a)(3) or 63.804(c)(2) or 63.804(d)(3) or 63.804(e)(2), performance testing must be conducted in accordance with 40 CFR 63, Subpart JJ and 326 IAC 3-6.

IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM), volatile organic compound (VOC) and Hazardous Air Pollutant (HAP) limits specified in Conditions D.1.2, D.1.3 and D.1.5 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2, and D.1.5 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 VOC Emissions

Compliance with Condition D.1.2 and D.1.5 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.11 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the spray booth (SB21) is in operation.

D.1.12 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray booth stacks (SB21A and SB21B) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.13 Record Keeping Requirements

- (a) To document compliance with Condition D.1.12, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (b) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be complete and sufficient to establish compliance with the VHAP usage limits established in Condition D.1.5.
 - (1) Certified Product Data Sheet for each finishing material, thinner, contact adhesive and strippable booth coating.
 - (2) The HAP content in pounds of VHAP per pounds of solids, as applied, for all finishing materials and contact adhesives used.
 - (3) The VOC content in pounds of VOC per pounds of solids, as applied, for each strippable coating used.
 - (4) The VHAP content in weight percent of each thinner used.
 - (5) When the averaging compliance method is used, copies of the averaging calculations for each month as well as the data on the quantity of coating and

thinners used to calculate the average.

- (c) To document compliance with Condition D.1.5, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.5.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) A log of the dates of use;
 - (3) The volume weighted VOC content of the coatings used for each month;
 - (4) The cleanup solvent usage for each month;
 - (5) The total VOC usage for each month; and
 - (6) The weight of VOCs emitted for each compliance period.
- (d) To document compliance with Condition D.1.6, the Permittee shall maintain records demonstrating actions have been taken to fulfill the Work Practice Implementation Plan.
- (e) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.